

GREER, BURNS & CRAIN, LTD.

Attorneys at Law

300 SOUTH WACKER DRIVE
SUITE 2500

CHICAGO, ILLINOIS 60606-6771

TELEPHONE (312) 360-0080

FACSIMILE (312) 360-9315

WWW.GBCLAW.NET

WRITER'S DIRECT DIAL
(312) 987-4009

WRITER'S E-MAIL ADDRESS
GOKEEFE@GBCLAW.NET

April 18, 2008

ROGER D. GREER
PATRICK G. BURNS
LAWRENCE J. CRAIN
STEVEN P. FALLON
PAUL G. JUETTNER
JAMES K. FOLKER
B. JOE KIM
THOMAS R. FITZSIMONS
CAROLE A. MICKELSON
KEVIN W. GUINN

ARIK B. RANSON
JOSEPH P. FOX
LAURA R. WANER
CHRISTOPHER J. MCGEEHAN
CHRISTOPHER S. HERMANSON
ANUJ K. WADHWA
GAVIN J. O'KEEFE

OF COUNSEL:
THOMAS R. JUETTNER*
JOHN W. CHESTNUT
PHILIP M. KOLEHMAINEN

*ADMITTED IN CALIFORNIA AND ILLINOIS

Via E-mail

Copyright Agent
GoDaddy
14455 N. Hayden Road
Suite 219
Scottsdale, AZ 85260
Email: CopyrightClaims@godaddy.com

FILED: APRIL 25, 2008
08CV2436 TG
JUDGE MANNING
MAGISTRATE JUDGE BROWN

Re: Copyright Takedown Demand pursuant to 17 USC §512
Our file: 2111.79363

Dear Copyright Agent:

Our firm represents Deckers Outdoor Corporation ("Deckers") in copyright and trademark matters. Deckers is known in the trade as UGG Australia and owns the UGG trademark for footwear, clothing, outerwear, bags, and other goods. UGG is a registered trademark in the United States, Europe, and more than 70 other countries around the world. Deckers maintains a website at <uggaustralia.com> where genuine UGG® goods are sold, including UGG sheepskin boots, and which contains copyright protected images and text.

The records maintained by Name Intelligence, Inc. provided through the website at <whois.sc>, indicate that your company is acting as the web host for

<ugginstock.com>. The operator of this website is infringing Deckers' copyrights and trademarks on a website that we believe to be selling counterfeit UGG® products.

A prominent portion of the text and multiple images that appear on the <ugginstock.com> website are unauthorized reproductions of Deckers' copyrighted works. Pursuant to 17 U.S.C. §512, we hereby request that you expeditiously take down the website located at <ugginstock.com> for violations of United States Copyright law.

Pursuant to 17 U.S.C. §512(c)(3)(A)(ii), we hereby identify the following copyrighted works that are being infringed by the site at <ugginstock.com>:

1. UGG Australia's "UGG Care Card" (Text).

Copyright work #1 is attached as **Exhibit A**.

2. UGG Australia's "Women's Collection" Picture (Image)
3. UGG Australia's UGG Pamphlet provided with new UGG products (Text and Image).

Pursuant to 17 U.S.C. §512(c)(3)(A)(iii), we hereby identify the following materials on the website at <ugginstock.com> that are infringing our client's copyrights:

1. UGG Australia's "UGG Care Card" (Text).

Infringing material #1 above is being used at:
<http://ugginstock.com/ugg_Classic_5815_Chestnut.asp>.

2. UGG Australia's "Women's Collection" Picture (Image)

Infringing material #2 above is being used at:
<http://ugginstock.com/ugg_UpSide_5163_Sand.asp>.

3. UGG Australia's UGG Pamphlet provided with new UGG products (Text and Image).

Infringing material #3 above is being used at:
<http://ugginstock.com/5815/black_2.jpg>.

Pursuant to 17 U.S.C. §512(c)(3)(A)(iv), we hereby provide the following contact information:

Gavin O'Keefe
GREER, BURNS & CRAIN, LTD.
Suite 2500
300 S. Wacker Drive
Chicago, IL 60606
Ph: 312-360-0080
Fax: 312-360-9315
Email: gokeefe@gbclaw.net

Pursuant to 17 U.S.C. §512(c)(3)(A)(v), we hereby state that we have a good faith belief that the use of the copyrighted materials described above by <ugginstock.com> is not authorized by the copyright owner, its agent, or the law.

Pursuant to 17 U.S.C. §512(c)(3)(A)(vi), we hereby state that the information in this Notice is accurate, and under penalty of perjury, that we are authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Pursuant to 17 U.S.C. §512(c)(3)(A)(i), the physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed follows below. If this copy is faxed or mailed, a physical signature is provided below, if this document is e-mailed, then an electronic signature follows.

Further, it is noted that Deckers has not authorized the use of its UGG trademark in the domain name <ugginstock.com> or on the webpage located at that domain, and that these uses therefore infringe Deckers' UGG trademark registrations.

Finally, investigation suggests that the <ugginstock.com> site is being used to sell counterfeit UGG goods from China to consumers in the U.S. These counterfeit sales violate multiple U.S. laws, including Title 15 of the United States Code. 15 U.S.C. §117(c) calls for statutory damages of up to \$1,000,000 for sales of counterfeit goods.

GoDaddy

April 18, 2008

Page 4

If you have any question regarding this matter, please contact me. Due to the very serious nature of this matter, we ask that you contact me at your earliest opportunity to advise us of what actions you will take.

Yours truly,

GREER, BURNS & CRAIN, LTD.

By 

Gavin O'Keefe

GJK

cc: T. Fitzsimons
S. Cucurullo
L. Evert-Burks

EXHIBIT A



Congratulations on your purchase of UGG sheepskin footwear. Your new shoes are made from the finest sheepskin available and will provide you with all of the warmth and comfort you've come to expect from UGG.

In order to attain the sumptuous color of these boots, the sheepskin has been treated with the finest dyes. As with any deep, rich shade, some dye transfer may occur onto light clothing or furniture, etc.

Gently spot clean with a damp cloth and avoid excessive exposure to water.